

EXHIBIT 1



November 10, 2017

Mr. Doug Handhoe
Slabbed New Media LLC
Post Office Box 788
Wiggins, MS 39577-0788
Via email and U.S. Postal Service

RE: Document Examination — *Charles L. Leary*

Dear Mr. Handhoe,

At your request I have examined the questioned documents to determine whether or not they were signed by *Charles L. Leary*. Below please find an account of all documents examined, along with my findings.

Questioned:

1. Copy of Charles Leary's First Amended Counterclaim As Well As Answer & Defenses to Douglas Handhoe's Third Amended Complaint for Damages, Declaratory and Injunctive Relief (Signature located on page 22)
2. Copy of Certificate of Service to Charles Leary's First Amended Counterclaim As Well As Answer & Defenses to Douglas Handhoe's Third Amended Complaint for Damages, Declaratory and Injunctive Relief (Signature located on page 23)

Exemplars: Documents bearing accepted genuine signatures and/or writings by *Charles Leary*

1. Notice of Motion To: Douglas Handhoe, stamped in upper right corner "Court Administration Nov 26 2013 Halifax, N.S."
2. Copy of letter from Trout Point Lodge to Honourable Justice Pierre Muise, dated 07/19/2013
3. Copy of Notice of Motion To: Douglas Handhoe, dated 07/19/2013
4. Copy of letter from Trout Point Lodge to Prothonotary, Supreme Court of Nova Scotia, dated 07/19/2013
5. Color copy of Notice of Application in Court To: Douglas K. Handhoe, dated 02/08/2013
6. Affidavit of Charles L. Leary, dated 01/23/2013
7. Notice of Application in Court To: Douglas K. Handhoe, dated 01/23/2013
8. Copy of Applicants' Brief on Converting an Application to an Action or Amending the Notice of Application, undated with "2013" in top left corner of first page

November 10, 2017
Mr. Doug Handshoe
Page 2

9. Notice of Action To: Doug Handshoe and Automattic, Inc., dated 11/28/2012
10. Statement of Claim, dated 11/28/2012
11. Copy of Notice of Intended Action, dated 07/25/2012
12. 1st Amended Notice of Action, dated 09/01/2011
13. 1st Amended Statement of Claim, dated 09/01/2011
14. Notice of Action To: Doug Handshoe, dated 08/09/2011
15. Statement of Claim, dated 08/09/2011
16. Copy of Affidavit of Charles Leary, dated 06/13/2011

Document Transfer: The Questioned and Known Exemplars were received on Friday, November 3, 2017 via U.S. Postal Service Priority 2-Day mailing. Copies of all documents received will remain in my file.

Comments: To establish that a particular person wrote a questioned signature and/or writing, a comparison between questioned and known writings must show substantial agreement in sufficient handwriting characteristics to identify the writer and eliminate the possibility of another writer. This examination covers obvious and inconspicuous handwriting characteristics.

Examination: All Known writing samples and Questioned writings were examined under magnification. Corresponding handwriting characteristics (including fluency, angle, form, speed, proportions, connecting strokes, spacing, beginnings, endings, alignment, idiosyncrasies) were compared in accordance with established scientific methods. Fundamental characteristics of pressure pattern and line quality were unable to be analyzed in all documents due to existence of copies and/or unavailability of originals.

A Worksheet was compiled for the purpose of comparison and evaluation. Images contained in the Worksheet may have been enhanced in Size, Contrast and/or Sharpness. The purpose of these enhancements is only to increase the clarity of the image for analysis and subsequent demonstrative purposes in this report and its attachments.

(Note: All documents were scanned into the examiner's computer at actual size. In order to maintain consistency in demonstrating the size of all writings, each document was opened in Preview and "Scaled Up" (increased in viewable magnification) once. Signatures were then copied electronically onto the Worksheet attached.)

Findings: Handwriting consistency exists among each set of the accepted genuine signatures, with variation. They are fluent, executed at a swift speed, with a rightward slant. K9, K12 and K14 have the signer's name printed underneath the signature. The signatures themselves, however, are illegible.

The Questioned signatures are written at a normal to swift speed, with a vertical slant. They are partially legible, the structure being vastly inconsistent with the sixteen Exemplars provided for comparison. Inconsistencies are found in the areas of fluency, angle, form, speed, proportions, connecting strokes, beginnings, and endings. See attached Worksheet titled "Comparison Worksheet — Charles L. Leary."

November 10, 2017
Mr. Doug Handshoe
Page 3

Questioned Document Q2, in addition to the signature of Charles Leary, contains the handwritten word "OCTOBER." The handwriting of this word did not appear to be consistent with the printed writing found in K9, K12 and K14. At my request, you provided me with the following documents for review, which were received as attachments via email on November 7, 2017.

Exemplars (Daniel G. Abel): Documents bearing accepted genuine signatures and/or writings by *Daniel G. Abel*

1. Electronic copy of Affidavit of Service, dated 02/21/2013
2. Electronic copy of Joinder in Removal of Defendant Daniel Abel, dated 06/14/2013
3. Electronic copy of Notice & Evidence of Plaintiff Douglas Handshoe's Refusal to Accept USPS Certified Mail and Certificate of Service, dated 06/21/2013, with copy of Ready Post envelope attached

Findings (Daniel G. Abel): Handwriting consistency exists among each set of the accepted genuine signatures of Mr. *Daniel Abel*, with minimal variation. They are executed at a normal speed, with a vertical slant. The signature of Mr. *Daniel Abel*, as well as writing found on the copy of the envelope, is written in a block, upper case print, consistent with the word "OCTOBER" found on Q2. In addition to consistencies in angle, speed, proportion and method of execution, similar unique characteristics were found to be consistent between the Questioned "OCTOBER" and Mr. *Abel*'s writing. These unique characteristics were found in construction of the letter "O," "C," "E," and "R."

Opinion: Based upon the documents submitted and examined, it is my professional opinion that it is Probable that the writer of the Known *Charles L. Leary* signatures Did Not sign the Questioned documents.

Furthermore, there are Indications that *Daniel G. Abel* may be the writer of the Questioned "OCTOBER" on Q2.

Opinion Terminology: (Recommended terminology of the American Society for Testing and Materials in expressing opinions resulting from handwriting examinations)

Identification: This is the highest degree of confidence expressed by document examiners in handwriting comparisons. The examiner is certain, based on evidence contained in the handwriting, that the writer of the known material actually wrote the writing in question.

Strong Probability: The evidence is very persuasive, yet some critical feature or quality is missing so that an identification is not in order; however, the examiner is virtually certain that the questioned and known writings were written by the same individual.

Probable: The evidence contained in the handwriting points rather strongly toward the questioned and known writings having been written by the same individual; however, it falls short of the "virtually certain" degree of confidence.

Indications: A body of writing has few features, which are of significance for handwriting comparison purposes, but those features are in agreement with another body of writing.

November 10, 2017
Mr. Doug Handshoe
Page 4

No Conclusion: This is the zero point of the confidence scale. It is used when there are significantly limiting factors, such as disguise in the questioned and/or known writing or lack of comparable writing, and the examiner does not have even a leaning one way or another.

Indications Did Not: This carries the same weight as the indications term — that is, it is a very weak opinion. The questioned writing has few features, which are of significance for handwriting comparison purposes, and those features are not in agreement with the known writing.

Probably Did Not: The evidence points rather strongly toward the questioned and known writings having not been written by the same individual; but, as in the probable range above, the evidence is not quite up to the “virtual certain” range.

Strong Probability Did Not: This carries the same weight as strong probability on the identification side of the scale — that is, the examiner is virtually certain that the questioned and known writings were not written by the same individual. The evidence is very persuasive, yet some critical feature or quality is missing so that a total elimination is not in order.

Elimination: This, like the identification, is the highest degree of confidence expressed by document examiners in handwriting comparisons. By using this expression the examiner denotes no doubt in his opinion that the questioned and known writings were not written by the same individual. The examiner has no reservations whatsoever, and although he is prohibited from using the word “fact,” he is certain, based on evidence contained in the handwriting, that the writer of the known material did not write the writing in question.

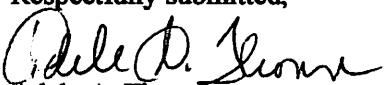
Conclusion: My opinions are drawn on the evidence presented to me for examination. These opinions may be subject to modification if unforeseen evidence is observed on original documents that were not available for the purpose of this examination, or if other evidence is presented to me after-the-fact indicating a result not consistent with my findings.

Attached to this report are a copy of my comparison Worksheet, statement of qualifications and my Fee Agreement reflecting the rate of compensation for all services I shall render in this case unless otherwise agreed upon in writing.

Please notify me as soon as possible should it become necessary for me to appear in Court so that I may secure that date on my schedule. Once notified, if time permits, I can prepare exhibits with enlargements to graphically demonstrate how I came to my opinions as stated above.

If you have any questions whatsoever or require additional details, please do not hesitate to contact me at (504) 430-5117.

Respectfully submitted,



Adele A. Thonn
Forensic Document Examiner

attachments



Adele A. Thonn

Forensic Document Examiner

CURRICULUM VITAE

EDUCATION

University of New Orleans; New Orleans, LA

> BA: General Business Administration

Benjamin Franklin Senior High School; New Orleans, LA

SPECIALIZED TRAINING

- > Forensic Document Examination Interactive Training Program developed by Board Certified Forensic Document Examiner (36-lesson course containing over 50 actual cases with outside reading assignments)
- > One-on-one case work with New Orleans-based Board Certified Forensic Document Examiner

CONTINUING EDUCATION

- > 2017 International Association for Identification, Louisiana Division (Baton Rouge, June 2017) — 4.5 hours
- > 2017 NADE Annual Conference (New Orleans, May 2017) — 25 hours
- > 2017 American Academy of Forensic Sciences (New Orleans, February 2017) — 10.75 hours
- > 2016 NADE Annual Conference (Portland, April 2016) — 24.25 hours
- > 2015 NADE Annual Conference (Nashville, April 2015) — 21.5 hours
- > NIST Measurement Science and Standards in Forensic Handwriting Analysis Conference (Post-Conference Webcast, June 2013) — 10.75 hours
- > 2013 NADE Annual Conference (Omaha, April 2013) — 18.5 hours
- > 2012 NADE Annual Conference (San Diego, April 2012) — 19.5 hours

208 Avalon Way
Metairie, LA 7001

Tel: (504) 430-5117
Email: adele.thonn@cox.net
www.thewriteconsultants.com

Adele A. Thonn

Forensic Document Examiner

The Write Consultants

208 Avalon Way

Metairie, LA 7001

Tel: (504) 430-5117

Email: adele.thonn@cox.net

www.thewriteconsultants.com

CURRICULUM VITAE (continued)

CONTINUING EDUCATION CONTD...

- > Mediation Arbitration Professional Systems CLE seminar (October, 2011) – 1 hour

COURT QUALIFICATIONS

- > Civil District Court, Parish of Orleans, Louisiana (2015, 2016, 2017)
- > 17th Judicial District Court, Thibodaux, Louisiana (2017)
- > 21st Judicial District Court, Amite, Louisiana (2016)
- > 24th Judicial District Court, Gretna, Louisiana (2016, 2017)
- > 32nd Judicial District Court, Houma, Louisiana (2017)

PRESENTATIONS

- > 2016 NADE Annual Conference (Poster Session, Portland, April 2016): “The Search for Familiar Handwriting Similarities — Comparisons of Adoptive Versus Biological Features”
- > Louisiana Association of Criminal Defense Lawyers Last Chance Seminar (New Orleans, December 2015): “Principles of Handwriting and Handwriting Identification”
- > Louisiana Forgery and Fraud Conference (Kenner, April 2013): “Principles of Handwriting and Handwriting Identification for the Forensic Document Examiner”

MEMBERSHIP

- > Associate Member, National Association of Document Examiners

CERTIFICATION

- > Candidate for Certification, National Association of Document Examiners (Target completion date of requirements is May 2018)

OTHER DISTINCTION

Adele A. Thonn

> Conference Chair, 2017 NADE Annual Conference

Forensic Document Examiner

The Write Consultants

208 Avalon Way

Metairie, LA 7001

Tel: (504) 430-5117

Email: adele.thonn@cox.net

www.thewriteconsultants.com



Adele A. Thonn
Forensic Document Examiner
www.thewriteconsultants.com

FEE SCHEDULE FOR PROFESSIONAL SERVICES

GENERAL SERVICES, per hour \$125.00
Document examination, handwriting comparison and related services.

COURT STANDBY, to reserve date \$375.00
To be applied to court appearance fees due. Refundable if notice of cancellation is received more than 3 business days in advance of court date. Fee is non-refundable if case settles on date of court appearance.

COURT APPEARANCE, per hour \$125.00
A pre-trial conference is advisable.

DEPOSITION, per hour \$125.00
Four-hour minimum due prior to or upon arrival at deposition.

TRAVEL, outside greater New Orleans metropolitan area \$.56/mile
Parking and related travel costs will be billed as incurred.

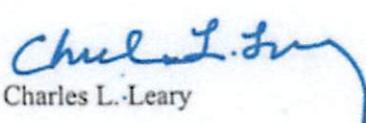
A retainer of \$500, which includes up to four hours of document examination, is customary upon submission of documents. Many cases are completed within this time. Case documents are stored seven or more years.

Payment of retainer and submission of documents confirms that you have read, understand and agree to this fee schedule. Please do not designate me as your expert prior to payment of non-refundable retainer.

We appreciate the opportunity to be of service.

Comparison Worksheet
Charles L. Leary

Questioned Signatures (10/20/2017)

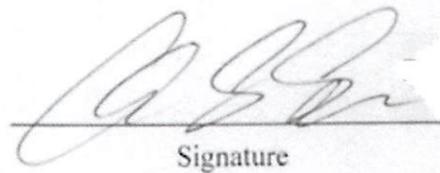
 
Charles L. Leary
Charles L. Leary

Q1

Q2

Known Exemplars

K1 (11/26/2013)


Signature

K2 (07/19/2013)



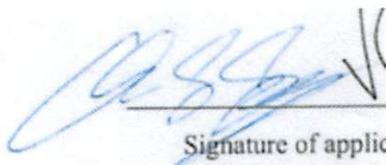
K3 (07/19/2013)



K4 (07/19/2013)



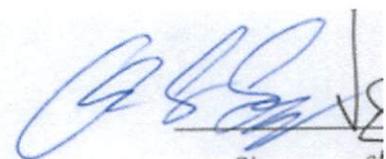
K5 (02/08/2013)


Signature of applic

K6 (01/23/2013)


Signature of Witness

K7 (01/23/2013)

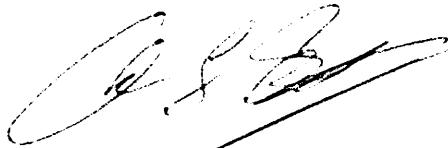

Signature

Comparison Worksheet
Charles L. Leary

K8 (2013)



K9 (11/28/2012)



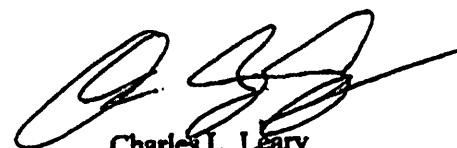
Charles L. Leary

K10 (11/28/2012)



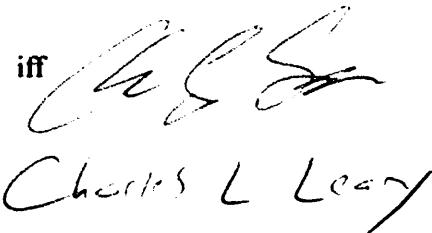
Charles L. Leary

K11 (07/25/2012)



Charles L. Leary

K12 (09/01/2011)



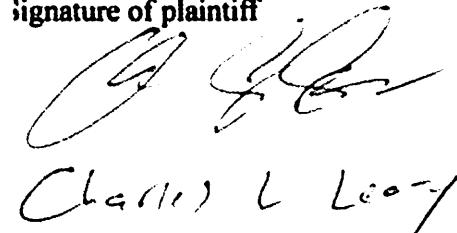
iff
Charles L. Leary

K13 (09/01/2011)



Charles Leary representing himself

signature of plaintiff

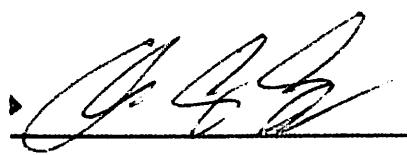


Charles L. Leary

K14 (08/09/2011)

Comparison Worksheet
Charles L. Leary

K15 (08/09/2011)



K16 (06/13/2011)



Charles L. Leary

Comparison Worksheet
Daniel G. Abel

Questioned Writing - Q2 (10/20/2017)

OCIOBER

Known Exemplars

K1 (02/21/2013)

DANIEL G. ABEL,
Daniel G. Abel

K2 (06/14/2013)

DANIEL ABEL

DANIEL ABEL

K3 (06/21/2013)

DANIEL G. ABEL,

DANIEL ABEL

DANIEL ABEL

ABEL

2421 CLEARNVIEW PKWY

SUITE 106

METAIRIE, LA 70001